

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

WOONASQUATUCKET RIVER  
WATERSHED COUNCIL, *et al.*,

*Plaintiffs,*

v.

DEPARTMENT OF  
AGRICULTURE, *et al.*,

*Defendants.*

Case No. 1:25-cv-00097-MSM-PAS

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**NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiffs file this notice to inform the Court of the recent relevant decision granting a temporary restraining order in *Maine v. Department of Agriculture*, No. 25-cv-131, 2025 WL 1088946 (D. Maine Apr. 11, 2025).

In *Maine*, the state sought a temporary restraining order enjoining the Department of Agriculture “from terminating, freezing, or otherwise interfering with the State’s access to federal funds based on alleged Title IX violations without following the process required by federal statute.” 2025 WL 1088946, at \*1. As in this case, the government argued that the federal district court lacked jurisdiction under the Supreme Court’s recent stay opinion in *Department of Education v. California*. The district court rejected that argument, explaining that although “a decision in the Plaintiff’s favor will likely result in ‘the payment of money by the Federal Government to the State,’ ‘this outcome is a mere by-product’ of the court’s review for APA compliance, and that the *California* stay opinion “does not change the

Court's determination that it is a proper forum for this dispute under the APA." *Id.* at \*19 & n.8 (quoting *Bowen v. Massachusetts*, 487 U.S. 879, 909–10 (1988)).

Dated: April 12, 2025

Respectfully submitted,

/s/ Miriam Weizenbaum

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**CERTIFICATE OF SERVICE**

On April 12, 2025, I caused the foregoing and accompanying materials to be served on all Defendants through the CM/ECF system.

/s/ Miriam Weizenbaum  
Miriam Weizenbaum